

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS CRUM
(PostCom/USPS-T-27-1-5)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatory to USPS witness Crum: PostCom/USPS-T-27-1-5. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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Counsel for Association for Postal Commerce

PostCom/USPS-T-27-1-1. You testify, at page 8, lines 8 – 11, that:

In Docket No. R97-1, the Postal Service proposed explicit econometric-based volume variability factors as part of their mail processing cost presentation. That was not done in this docket for effectively all of the parcel operations and some portion of the flats operations.

(a) What do you mean by the word “effectively”; identify all parcel operations in which explicit econometric-based volume variability factors were employed with citations to the presentation of this analysis.

(b) Identify the portions of flats operations for which econometric-based volume variability factors (i) were, and (ii) were not proposed with citations to the presentation of each variety of analysis.

PostCom/USPS-T-27-1-2. Please supply the “special study” referred to at page 8 line 23 of your testimony.

PostCom/USPS-T-27-1-3. You indicate at page 9 lines 1 – 4 that you “have chosen to use the average density for all Standard (A) parcels from that study . . .”

(a) Please describe every alternative measure of density that you analyzed, with citations to the source of that density and, if created by a calculation done by you, the calculation and sources of every factor in it.

(b) Disclose the basis on which you came to believe that each of the alternative densities disclose above was less reasonable than the average density that you employed.

PostCom/USPS-T-27-1-4. You testify, at page 9 lines 14 – 15 that “Window service costs by shape were developed from a new analysis . . . taken from the testimony of witness Daniel.”

(a) Please disclose each element of witness Daniel’s testimony that you took in this regard with citation to the place(s) in her testimony where that material appears.

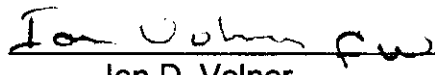
(b) Witness Daniels testifies that one purpose of her presentation is to supply “a general indication of how costs are influenced by weight.” USPS-T-28 at 1, line 7. Do you believe that the material taken from her testimony is appropriately used by you given that general disavowal of specificity? Please explain any affirmative answer.

PostCom/USPS-T-27-1-5. In the portion of your testimony cited in interrogatory cited in USPS-T-27-4 above, you testify that the "new analysis [was] presented in the testimony of witness Degen." Supply citations to every place in witness Degen's testimony in which the analysis to which you refer appears.

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CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.


Ian D. Volner